



February 10, 2009

Mr. Richard Weeks  
Regional Director  
Virginia Department of Environmental Quality - Piedmont Regional Office  
4949-A Cox Road  
Glen Allen, VA 23060

Re: Old Dominion Electric Cooperative – 1,500-MW Cypress Creek Power Station February 2009 Supplement - Case-by-Case Maximum Achievable Control Technology Analysis and Revised Form 7 Application Pages

Dear Mr. Weeks:

Old Dominion Electric Cooperative (ODEC) submitted a Prevention of Significant Deterioration (PSD) permit application for the proposed Cypress Creek Power Station in December 2008. The Case-by-Case Maximum Achievable Control Technology (MACT) analysis (Appendix E) has been completed for the two pulverized coal boilers, along with the MACT application forms. (The MACT application forms are being completed at the request of the VDEQ and provide unit specific emissions information in support of the 112(g) analysis. The Cypress Creek PC boilers are not subject to 112(j), as the forms are titled.) Additionally, several construction permit application pages in Appendix A of the submitted application have been updated to reflect the MACT analysis and some pollutant emissions have been corrected. These items are being submitted as a supplement to the December 2008 PSD permit application.

The following attachments are being included as a replacement or supplement to the December 2008 PSD permit application:

- Attachment 1: Four copies of the revised construction permit Form 7 application (Appendix A of application)
- Attachment 2: Four copies of the Boiler HAPs Emissions sheet (Appendix C of application)
- Attachment 3: Four copies of the MACT Analysis, including forms (Appendix E of application)
- Attachment 4: 2 CDs of the entire permit application (including revisions)

The MACT Analysis (Attachment 3) is a supplement to the December 2008 submittal. Attachments 1, 2, and 4 are to replace the December 2008 submittal pages and CD in the application.

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The Class I and Class II Air Dispersion Modeling Analyses, required for a PSD permit application, will be submitted after the BACT and MACT emission rates have been determined. Additionally, the Additional Impacts Analysis will be fully completed once the BACT and MACT emission rates have been determined.

If you have any questions regarding this submittal, please do not hesitate to contact me at 804-968-4045, or via email at [dsmith@odec.com](mailto:dsmith@odec.com). You may also contact our consultant at Burns & McDonnell, Mary Hauner-Davis at 816-822-4252 or via email at [mhauner@burnsmcd.com](mailto:mhauner@burnsmcd.com). We look forward to your evaluation of the application.

Sincerely,



David N. Smith  
Director of Environmental, Health & Safety Services

Enclosures

cc: Mary Hauner-Davis, Burns & McDonnell  
Minda Nelson, Burns & McDonnell  
Douglas Randall, Burns & McDonnell  
John Stower, Burns & McDonnell  
Penny Shamblin, Hunton & Williams